

**IN THE UNITED STATES DISTRICT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

HICHAM IMANI,	:	
	:	
Plaintiff,	:	Civil Action No. 07-07966-LTS
	:	
v.	:	District Judge Honorable
	:	Laura Taylor Swain
U-HAUL INTERNATIONAL, INC., U-HAUL CO. OF PENNSYLVANIA and U-HAUL CO. OF NEW YORK AND VERMONT, INC.,	:	
	:	
	:	
Defendants.	:	
	:	

JOINT MOTION TO FILE DOCUMENTS UNDER SEAL

Defendants U-Haul Co. of New York and Vermont, Inc., U-Haul Co. of Pennsylvania, and U-Haul International, Inc. (“Defendants”) and Plaintiff Hicham Imani (“Imani” or “Plaintiff”), by and through their attorneys, submit this Motion and respectfully request that the Court allow the parties to file Confidential documents under seal pursuant to Rule 6 of the United States District Court, Southern District of New York, Procedures for Electronic Case Filing.¹ Defendants do not waive any of the arguments with respect to whether U-Haul Co. of Pennsylvania and U-Haul International, Inc. are proper parties and/or subject to the jurisdiction of this Court by submitting this Joint Motion regarding the filing of Confidential documents.

1. On October 22, 2007, the parties entered into a Stipulation of Confidentiality regarding the production of documents and information that are confidential, proprietary, or of a

¹ Defendants deny that Defendants U-Haul International, Inc. and U-Haul Co. of Pennsylvania are proper parties to this action. Defendants further deny that this Court has personal jurisdiction over these two defendants. By submitting this Joint Motion, Defendants do not thereby waive their right to object to the Court’s personal jurisdiction over Defendants U-Haul International, Inc. and/or U-Haul Co. of Pennsylvania, or to raise the issue of whether Defendants U-Haul International, Inc. and/or U-Haul Co. of Pennsylvania are proper parties to this action.

personal nature to the parties or to the current or former employees of Defendants (hereinafter referred to collectively as “Confidential Materials”).

2. Paragraph 6 of the Stipulation of Confidentiality provides that “[a]ny documents filed with the Court containing Confidential Material shall be designated as such and filed under seal.”

3. The parties hereby request permission to file documents containing Confidential Materials under seal, in accordance with Rule 6 of the United States District Court, Southern District of New York, Procedures for Electronic Case Filing.

Respectfully submitted,

s/Theresa J. Chung
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Attorneys for Defendants
U-Haul International, Inc., U-Haul Co. of
Pennsylvania, and U-Haul Co. of New York
and Vermont, Inc.

Date: November 19, 2007

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served a true and correct copy of the Joint Motion To
File Under Seal via the Court's ECF filing system, this 19th day of November, 2007, on:

Scott B. Goldshaw
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Attorneys for Plaintiff Hicham Imani

/s/ Theresa J. Chung
Theresa J. Chung